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Attorneys for Plaintiff
MATTHEW R. LEIMBACH

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

MATTHEW R. LEIMBACH,)	CIVIL NO. 14-00246 JMS-RLP
)	(EMTALA)
Plaintiff,)	
)	NOTICE OF TAKING DEPOSITION
)	UPON ORAL EXAMINATION OF
vs.)	DEFENDANT HAWAII PACIFIC
)	HEALTH, PURSUANT TO FRCP
)	30(b)(6)
HAWAII PACIFIC HEALTH,)	
WILCOX MEMORIAL HOSPITAL,)	Deposition Date: 4-23-2015
KAUAI MEDICAL CLINIC,)	Deposition Time: 9:00 a.m.
WILCOX HEALTH SYSTEM,)	Location: Carnazzo Court Reporting
and DOES 1-50,)	888 Mililani St. Ste 705,
)	Honolulu, HI 96813
)	
)	Judge: Honorable J. Michael Seabright
Defendants.)	Magistrate Judge:
)	Honorable Richard L. Puglisi
)	

EXHIBIT "A"

**NOTICE OF TAKING DEPOSITIONS UPON ORAL EXAMINATION OF
DEFENDANT HAWAII PACIFIC HEALTH, PURSUANT TO FRCP 30(b)(6)**

To: Jan M. Vernon, Esq.
William S. Hunt, Esq.
Alston Hunt Floyd & Ing
1001 Bishop Street, Suite 1800
Honolulu, HI 96813
(Attorneys for Defendants)

PLEASE TAKE NOTICE that the above-captioned Plaintiffs will take the following deposition at **Carnazzo Court Reporting**, 888 Mililani St., Ste. 705, Honolulu, HI 96813 (Telephone: 808-532-0222) on the date and time set forth below:

NAME AND ADDRESS

DATE AND HAWAII TIME

HAWAII PACIFIC HEALTH
c/o Jan M. Vernon, Esq.
William S. Hunt, Esq.
Alston Hunt Floyd & Ing
1001 Bishop Street, Suite 1800
Honolulu, HI 96813

April 23, 2015 at 9:00 a.m.

Said DEPOSITION shall be upon oral examination on **April 23, 2015**, at the time indicated above transcribed at **Carnazzo Court Reporting**, 888 Mililani St., Ste. 705, Honolulu, HI 96813, pursuant to the provisions of Rule 30 of the Federal Rules of Civil Procedure (FRCP), before an officer authorized by law to administer oaths pursuant to FRCP 30.

Matters For Examination

Pursuant to FRCP 30(b)(6), the matters for examination, subject to amendments/supplementation, include as to each designee or designees (unless otherwise indicated):

1. response(s) by HPH to the First Amended Complaint (FAC);
2. matters relating to exhibits to be included with HPH's response(s) to the FAC;
3. medical records of Plaintiff;
4. protocols, procedures, rules, and the like required by HPH to identify necrotizing fasciitis (NF), necrotizing cellulitis, sepsis and the symptoms and risk factors related thereto.
5. trial exhibits (defense);
6. trial witnesses and representatives (defense);
7. defenses;
8. allegations of the FAC, including medical records of other NF patients named therein;
9. discriminatory medical decision-making by HPH's clinic (KMC), E.D. and Hospital in this case;
10. the emergency room records of all patients since Hurricane Iniki who presented with

- A. symptoms of necrotizing fasciitis;
- B. symptoms of necrotizing cellulitis;
- C. symptoms of viral infection;
- D. cause for MRI and/or aspiration and/or biopsy.

Continuing Depositions

The depositions will continue from day to day until completed. You are invited to attend and cross-examine.

DATED: Honolulu, Hawaii, April 7, 2015.


/s/ **STEPHEN M. SHAW**

STEPHEN M. SHAW
PAUL H. SACCOCCIO
Attorneys for Plaintiff
MATTHEW R. LEIMBACH